



MARTIN GROSSBACH
PATRICIA A. HAYES

CANDICE S. GROSSBACH *
CHRISTOPHER S. TRAMAGLINI

* ADMITTED IN NY AND MA

MEMO ENDORSED

April 18, 2008

VIA FAX TO 914-390-4179

United States District Court
Southern District of New York
300 Quarropas Street, Room 633
White Plains, New York 10601

Attention: Hon. Stephen C. Robinson

Re: **United States v. Zion Cohen**

Dear Judge Robinson:

We previously communicated with you regarding our client's request for permission to travel to Philadelphia from April 20, 2008 through April 26, 2008, as per our letter dated April 14th. (copy enclosed). Thereafter, we were advised that your Honor wanted us to obtain confirmation for the US Attorney that they would have no objection to the requested travel plans.

Yesterday and this morning I left two voice mail messages for Michael Ben'Ary, the current Assistant US Attorney assigned to the case, and followed up with a written request sent by fax to his office at 9:44 a.m. this morning, a copy of which is enclosed for your reference. I have not received any return call or letter.

As we are near the end of the day, and my client's plans are to leave on Sunday, April 20th, it is respectfully requested that your Honor advise if you will consent to the travel plans.

Thank you for the Court's consideration in this matter.

Very truly yours,

MARTIN GROSSBACH, P.C.

MARTIN GROSSBACH

APPLICATION DENIED

Stephen C. Robinson
USAJ 4/18/08

MG/ct
Encl

cc: Zion Cohen
Lawrence Maffei, Esq.

